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DECLARATION OF JESSE MERRITHEW IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE
OVERLENGTH BRIEF - 1
(Case No. 3:20-cv-00917-HZ)

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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

DON'T SHOOT PORTLAND, et al.,

Plaintiffs,

vs.

CITY OF PORTLAND,

Defendant.

Case No. 3:20-cv-00917-HZ

**DECLARATION OF JESSE
MERRITHEW IN SUPPORT OF
PLAINTIFFS' UNOPPOSED
MOTION FOR LEAVE TO FILE
OVERLENGTH BRIEF**

I, Jesse Merrithew, declare under penalty of perjury under the laws of the United States of America pursuant to 28 USC § 1746 that the following is true and correct:

1. I am one of the attorneys representing the plaintiffs in this matter.
2. I make this declaration in support of *Plaintiffs' Unopposed Motion for Extension of Time Or, In The Alternative, To Reconsider.*
3. I have primary editing responsibilities for the brief at issue.
4. The motion, along with approximately 30 new supporting declarations and dozens of exhibits, was nearly ready for filing at the time the Court issued its order in Dkt. No. 248. The brief is currently 75 pages. I cannot cut 33% of the brief and ensure that it still appropriately cites all of the supporting evidence necessary to meet our burden prior to today's deadline. It is my opinion that the brief, in its current state, is not substantially longer than necessary to meet the burden and remain persuasive and clear. Making the kind of cuts necessitated by the Court's order will take time in order to avoid detracting from the quality of the brief.

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DECLARATION OF JESSE MERRITHEW IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE
OVERLENGTH BRIEF - 2
(Case No. 3:20-cv-00917-HZ)

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DATED this 14th day of January, 2022.

By: s/Jesse Merrithew
Jesse Merrithew, OSB No. 074564
Of Attorneys for Plaintiffs